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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Harrisonburg DIVISION

Herbert L. Singleton

Plaintiff(s),

v.

Astro holdings company
LLC.

Defendant(s).

(Enter the full name(s) of ALL parties in this lawsuit.
Please attach additional sheets if necessary).

Civil Action No.: 5:21-cv-00020
(To be assigned by Clerk of District Court)

CLERK'S OFFICE U.S. DIST. COURT
AT HARRISONBURG, VA
FILED

COMPLAINT

MAR 11 2021

PARTIES

JULIA C. DODLEY, CLERK
BY: [Signature]
DEPUTY CLERK

1. List all Plaintiffs. State the full name of the Plaintiff, address and telephone number.
Do the same for any additional Plaintiffs.

a. Plaintiff No. 1

Name: Herbert Lee Singleton III
Address: 410 Effinger St
Telephone Number: 540-560-8751

b. Plaintiff No. 2

Name: _____
Address: _____
Telephone Number: _____

2. List all Defendants. State the full name of the Defendant, even if that Defendant is a government agency, an organization, a corporation, or an individual. Include the address where each Defendant may be served. Make sure that the Defendant(s) listed below are identical to those contained in the above caption of the complaint.

a. Defendant No. 1

Name: Astro holdings company LLC
Address: 135 hard scrabble Lake Dr, Chappaqua, Ny 10514

b. Defendant No. 2

Name: Derick Reid (district manager
Address: 135 hard scrabble Lake Dr, Chappaqua, Ny 10514

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.c., 2.d., etc.).

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case. Federal courts also have jurisdiction over cases where the United States is a Defendant.

3. What is the basis for federal court jurisdiction?

☒ Federal Question ☐ Diversity of Citizenship ☐ Government Defendant

4. If the basis for jurisdiction is Federal Question, which Federal Constitution, statutory or treaty right is at issue? List all that apply.

Discrimination leading to wrongful termination,
& unequal pay.

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff No. 1: _____ State of Citizenship: _____

Plaintiff No. 2: _____ State of Citizenship: _____

Defendant No. 1: _____ State of Citizenship: _____

Defendant No. 2: _____ State of Citizenship: _____

Attach additional sheets of paper as necessary and label this information as paragraph 5. Check here if additional sheets of paper are attached. ☐

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Do not give any legal arguments or cite cases or statutes. Each paragraph must be numbered separately, beginning with number 6. Please write each single set of circumstances in a separately numbered paragraph.

6. During my employment I was subjected to a hostile work environment & I told Terrence Fuller plenty of times about how Derrick Reid was treating me, referring me to customers as "the big black angry guy" during & after my employment. Astro as a company failed to protect me during August 2nd, 2020. I was attacked by a homeless man after asking my store multiple times to assist. Body fluids were thrown on me during a pandemic causing me to defend myself leading to my termination.

I have video evidence of part of the ordeal. The company failed to protect me during Covid on top of not making all customers wear masks. I was called a angry person for having to defend myself where the company ultimately failed me. I worked a week & a half before Terrence Fuller called me & said I was not allowed back in store because "incident" was not a good look. I feel like I was let go because of me making complaints about the roach problem they had on top of me asking for a raise. I was one of the top stores in the company & I was getting paid way less than under performing store managers. I've been hospitalized due to the emotional toll the loss of my job was & I have been struggling to find employment since.

Attach additional sheets of paper as necessary and label them as Additional Facts and continue to number the paragraphs consecutively. Check here if additional sheets of paper are attached. ☐

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

I am asking for \$120,000 for emotional damages, lost wages, lost vacation time, lost bonuses & commissions.

DEMAND FOR JURY TRIAL:

☒ YES

☐ NO

Signed this 11th day of march, 2021

Signature of Plaintiff No. 1



Signature of Plaintiff No. 2

NOTE: All Plaintiffs named in the caption of the complaint must date and sign the complaint. Attach additional sheets of paper as necessary.